

## **Exhibit D**

IN THE UNITED STATES DISTRICT COURT  
SOUTHER DISTRICT OF TEXAS

Paul R. F. Schumacher,

Plaintiff, pro se,

v.

Capital Advance Solutions LLC, Charles  
Betta, and Dan Logan,

Defendants.

Civil Action No. 4:18-cv-00436

**AFFIDAVIT OF DEFENDANT DAN LOGAN**

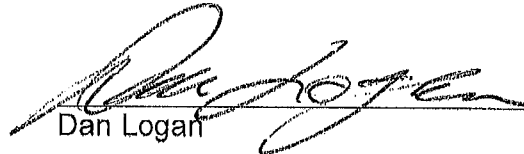
The undersigned, Dan Logan, of full age, being duly sworn according to law, deposes and says under the penalty of perjury:

1. I make this Affidavit in support of my Motion to Dismiss plaintiff Paul R. F. Schumacher's Complaint for failure to state a claim upon which relief can be granted, pursuant to *Federal Rule of Civil Procedure* 12(b)(6).
2. I am domiciled in the State of New Jersey and I have no business or personal ties to the State of Texas.
3. I do not and have never owned any real property in the State of Texas.
4. I do not and have never had any relationship with plaintiff, Paul R. F. Schumacher, and I do not know where Mr. Schumacher resides.
5. At the time plaintiff allegedly received telemarketing calls from Capital Advance Solutions, I was the Chief Financial Officer of Capital Advance Solutions, LLC.
6. In my capacity as Chief Financial Officer of Capital Advance Solutions, LLC, I managed the company's finances and accounting.
7. In my capacity as Chief Financial Officer of Capital Advance Solutions, LLC,

I was not responsible for the company's marketing strategies and techniques, nor was I involved in the same.

8. Capital Advance Solutions, LLC is a New Jersey corporation that has no business ties to the State of Texas
9. Capital Advance Solutions, LLC has never had any business locations in the State of Texas.
10. Capital Advance Solutions, LLC does not and has never owned any real property in the State of Texas.
11. I did not call plaintiff Paul R. F. Schumacher, or direct calls to be placed to Mr. Schumacher, as alleged in plaintiff's Complaint.
12. I am unaware of any call made to plaintiff Paul R. F. Schumacher on my behalf, or on behalf of Capital Advance Solutions, LLC, as alleged in plaintiff's Complaint.

I hereby certify that the foregoing statements are true to the best of my knowledge. I understand that if any of the foregoing statements are willfully false, I may be subject to punishment.

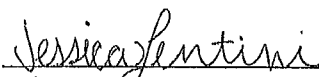
  
Dan Logan

Dated: July 10, 2018

Sworn and subscribed to

before me this 10<sup>th</sup> day

of July, 2018.

  
Jessica Lentini, Esq.  
Attorney I.D. # 193012017